

# **Georgia Department of Natural Resources**

## **Environmental Protection Division**

2 Martin Luther King Jr. Drive, Suite 1054, Atlanta, Georgia 30334  
Judson H. Turner, Director  
(404) 656-7802; Fax. (404) 651-9425



March 18, 2014

### **VIA EMAIL & REGULAR MAIL**

Ms. Michelle Davis  
General Chemical Corporation  
1427 Central Avenue  
East Point, Georgia 30344

Re: December 2013 VRP Semi-Annual Progress Report  
General Chemical Site, HSI# 10498  
East Point, Georgia  
Tax Parcel ID #s 14 013100010176 & 14 013100010184

Dear Ms. Davis:

The Georgia Environmental Protection Division (EPD) has received the December 26, 2013 Semi-Annual Groundwater Monitoring Report #11, which constitutes as the Voluntary Remediation Program (VRP) 2<sup>nd</sup> Semi-Annual Progress, that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by GeoSyntec on behalf of General Chemical Corporation (GC). In addition, EPD has also received the December 26, 2013, "Response" to EPD's April 12, 2013 VRP Application & Plan Comments letter, and the December 18, 2013, Horizontal Delineation Sampling Memorandum, prepared by GeoSyntec on behalf of GC. According to EPD's April 12, 2013 VRP Application & Plan Comments letter, Comments 1-8 were to be addressed through future report submittals for the site. Based on the information provided within the above referenced document submittals, the next scheduled Progress Report submittal (April 2014) will provide additional documentation to complete the responses to EPD's April 2013 VRP comments. Therefore, EPD will defer concurrence that the April 2013 comments have been completely addressed until after the receipt of the noted future progress report submittal(s). However, after completing its review of the above referenced document(s), EPD has prepared the following additional comment(s):

- 1) The proposed soil and groundwater Type 1 and Type 4 risk reduction standard (RRS) for sulfate and aluminum are acceptable for use at the above referenced subject site, provided the surface water exposure pathway is eliminated. In addition, please note that based on these approved values, EPD concurs that no further soil delineation for sulfate and aluminum will be required at this time.
- 2) Please note that a sufficient amount of documentation has been provided to demonstrate that upgradient groundwater conditions exhibit concentrations higher than anticipated regional background values for Sulfate and Aluminum.
- 3) According to the December 18, 2013, Horizontal Delineation Memorandum, petroleum like material was present in the cuttings at the DB-04 location and the field forms for the well installation and sampling indicated the following: product present before and after purging, diesel smell, and a visible "sheen" was present. Due to the proximity of the DB-04 location to

the site and the potential that this substance may be present within the site boundary, please confirm and characterize the "product"/source material that was identified in the subsurface at this location.

The above comment must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by GC. However, failure of EPD to respond to a submittal within any timeframe does not relieve GC from complying with the provisions, purposes, standards, and policies of the Act.

EPD has placed the December 2013 Progress Report in the HSI #10498 facility file for public review. Should you have any additional questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: Rob Savarese, General Chemical  
Bobby Triesch, Newell Recycling, LLC  
Brian Jacobson, Geosyntec

File: VRP Application 887983819 – General Chemical Site #10498